

United States Courts  
Southern District of Texas  
FILED

JUN 28 2011

*(David J. Bradley, Clerk of Court)*

# UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America )

v. )

Ramoni Alade Matti )

)  
)  
)  
)

Case No. *H11-736M*

*W*

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 27, 2011 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

Title 18, United States Code,  
Sections 1341 and 2 (Mail Fraud)

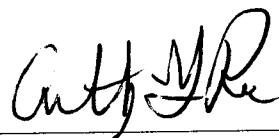
*Offense Description*

did devise or intend to devise a scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, and for the purpose of executing such scheme or artifice or attempting to do so, placed in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the Postal Service, or took or received therefrom, any such matter or thing, or knowingly caused to be delivered by mail according to the direction thereon, any such matter or thing, in violation of Title 18, United States Code, Sections 1341 and 2, Mail Fraud.

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.



*Complainant's signature*

U.S. Postal Inspector Anthony G. Rose

*Printed name and title*

Sworn to before me and signed in my presence.

Date:

6/28/11



*Judge's signature*

City and state:

Houston, Texas

U.S. Magistrate Judge George C. Hanks, Jr.

*Printed name and title*

**Affidavit in Support of  
Search Warrant**

1. I, United States Postal Inspector Anthony G. Rose, have been employed by the U.S. Postal Inspection Service since 1996. I am currently assigned to the Mail Theft/ Identity Theft team in Houston, TX and have received specialized training in numerous Postal crimes, primarily those involving identity theft and bank fraud related offenses. I am familiar with how identity thieves use victims' information to open fraudulent credit card accounts or compromise victims' existing credit card accounts. The identity thieves then use the credit card accounts to purchase merchandise, make cash withdrawals, purchase gift cards, and conduct other transactions.
2. The information set forth in this Affidavit is based upon Affiant's personal knowledge and/or information provided to Affiant by other law enforcement officers, fraud investigators, and other individuals the undersigned believes to be reliable and credible.
3. Because this Affidavit is being submitted for the limited purpose of supporting a criminal complaint, Affiant has not included each and every fact concerning this investigation. Affiant has set forth only the facts believed to establish probable cause that Ramoni Alade Matti has committed violations of federal law.
4. In June 2011, Affiant was contacted by Leslie Godden, Fraud Investigator with Chase Bank, regarding numerous Chase credit card accounts that had been determined by Chase to be fraudulent accounts. Godden told Affiant she had found 27 Chase credit card accounts that had either been opened via stolen identities or were existing Chase credit card accounts that had somehow been compromised and used without the true cardholder's consent. Godden had linked these accounts because the same phone numbers accessing the accounts, addresses on the accounts, and the account activity were used by the suspect(s).
5. Chase Bank Investigator Godden provided records to Affiant concerning the fraudulent accounts and Affiant discovered one phone number, (281) 818-3310, had been captured by Chase Bank's Automated Number Index (ANI) system accessing 12 of the

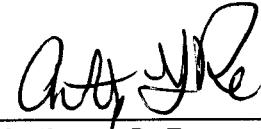
27 fraudulent accounts since March 7, 2011 and it last called regarding a fraud account on June 7, 2011. This target phone number had also called Chase Bank on at least three other credit card applications related to this fraud scheme that were ultimately declined by Chase Bank. Godden also provided Affiant with ATM bank video showing a black male withdrawing funds from one of these fraudulent accounts at a drive-up ATM on April 19, 2011. The suspect in the video was driving a silver Honda Odyssey van with no license plate on the back of the van.

6. Affiant researched phone number (281) 818-3310 and found it to be a cellular phone number with the listed provider of T-Mobile, USA. Affiant obtained a Federal cell site phone court order number H-11-657M on June 9, 2011, and using tower and call records provided by T-Mobile Affiant was able to determine the location of the phone was within the 2000 building at RiverRaine Apartment Complex, 9301 Beechnut Street, Houston, Texas.
7. Affiant drove to the RiverRaine Apartment Complex on June 13, 2011 and located a Honda Odyssey van with a temporary paper license plate in the back window parked outside the 2000 building. The van matched the one driven by the suspect at the ATM on April 19, 2011.
8. Affiant met with the apartment manager at RiverRaine Apartments, Linda Henderson, and inquired if she knew who drove the silver Honda van. She stated she did not but would place a sticker on the vehicle to have the owner come to the office because all vehicles on the property were required to have a license plate on the vehicle. Later that same evening, Henderson called Affiant and stated the resident of Apartment 2004, Kolawole Onenese, had come to the office after finding the sticker on the van. Onenese told the manager he owned the van and he was in the process of shipping it to Nigeria.
9. Affiant obtained a copy of the lease agreement for Apartment 2004 and found Onenese rented the apartment on April 25, 2011 and is the only occupant listed on the lease. Onenese also listed the target phone number, (281) 818-3310, on his lease agreement as his work phone number.

10. On June 23, 2011 Affiant obtained a Federal search warrant for the residence at 9301 Beechnut Street, Apartment 2004, Houston, Texas. On June 27, 2011, Affiant and other U.S. Postal Inspectors conducted surveillance at that address and observed Kolawole Onenese and another black male subject enter the apartment at different times. Affiant and the other agents executed the search warrant, located Onenese, and identified the second black male as Ramoni Alade Matti. Matti stated he actually lived at the apartment and Onenese had rented the apartment for him because Matti is in the United States illegally and has no Social Security Number.
11. From the living room area of the apartment, Affiant recovered a laptop computer, TransUnion credit reports in various names, credit cards, cell phone sim cards, a spiral notebook filled with personal identifying information of dozens of people, and other items related to identity theft. Affiant also recovered numerous credit cards, TransUnion credit reports, mail addressed to various names, and other evidence in Ramoni Matti's bedroom and closet. Another laptop computer and phones were recovered from the dining room table.
12. After being transported to Affiant's office at 401 Franklin Street in Houston, Texas, Kolawole Onenese was advised of his Miranda rights and he waived his rights and agreed to answer questions. He stated the laptop computer, credit cards, spiral notebook, and credit reports found in the living room belonged to him and he was applying for credit cards using stolen identities. He also admitted using the fraudulently obtained credit cards for purchases and cash. Onenese also stated that Ramoni Matti was also applying for and receiving credit cards using stolen identities and using the cards for cash and purchases.
13. Ramoni Matti was also transported to Affiant's office and also waived his Miranda rights and agreed to answer questions. He stated he was the black male shown in the ATM video mentioned earlier in this affidavit withdrawing money from a fraudulent Chase credit card. He stated he was involved in credit card fraud with Kolawole Onenese but he was only helping Onenese by using fraudulent credit cards that Onenese obtained for cash and purchases. Matti stated he did not apply for any credit cards using stolen

identities but could not explain the credit cards and credit reports found in his bedroom and closet. Matti did admit that the laptop computer on the dining room table was his computer.

12. Based upon the above, the undersigned believes there is probable cause to believe that, on or about June 27, 2011, Ramoni Alade Matti committed violations of Title 18, United States Code, Sections 1341 and 2 (Mail Fraud).

  
\_\_\_\_\_  
**Anthony G. Rose**  
**United States Postal Inspector**

Sworn and Subscribed to me this 28<sup>th</sup> day of June, 2011, and I find probable cause.

  
\_\_\_\_\_  
**George C. Hanks, Jr.**  
**United States Magistrate Judge**  
**Southern District of Texas**